



RE: Chevron Corp. v. Donziger, 11-Civ-0691 (SDNY) (LAK)

Champion, Anne to: [REDACTED]@nysd.uscourts.gov'

02/21/2014 03:18 PM

"Neuman, Andrea E.", Richard Friedman, "Mastro, Randy M.",

Cc: "stevenrdonziger@gmail.com", "zoe@littlepagebooth.com"

(zoe@littlepagebooth.com) (zoe@littlepagebooth.com)", "Seley,

From: "Champion, Anne" <AChampion@gibsondunn.com>

To: "[REDACTED]@nysd.uscourts.gov" [REDACTED]@nysd.uscourts.gov>

Cc: "Neuman, Andrea E." <ANeuman@gibsondunn.com>, Richard Friedman
<rfriedman@friedmanrubin.com>, "Mastro, Randy M." <RMastro@gibsondunn.com>,
"stevenrdonziger@gmail.com" <stevenrdonziger@gmail.com>, "zoe@littlepagebooth.com"

History: This message has been replied to and forwarded.

1 attachment



101631597_8 (Plaintiff Chevron Corporations Objections to Defendants Exhibits (updated to include DX 8095).pdf

Dear [REDACTED]:

The parties provide this joint response.

The PDF sent to you on Wednesday, which was provided to the Court on November 26, 2013 (and marked as Court Exhibit D), includes all of Defendants' exhibits except for DX 8095, which was not moved in until that day. We are attaching a spreadsheet that is identical to Exhibit D except that it now includes DX 8095 (and shows an updated February 20, 2014 date). All parties confirm that this PDF includes all of Defendants' exhibits (as well as noting Chevron's objections).

Chevron also notes that Chevron and the Donziger Defendants filed a stipulation on February 1, 2014 (Dkt. 1864-1) identifying those exhibits subject to this Court's order of December 13, 2013 (Dkt. 1830) regarding Defendants' exhibits which were provided without complete translation.

Respectfully submitted,
Anne Champion

-----Original Message-----

From: [REDACTED]@nysd.uscourts.gov [REDACTED]@nysd.uscourts.gov

]

Sent: Thursday, February 20, 2014 5:52 PM

To: Chevron Service - Camacho/Piaguaje:Gomez, J.

Cc: Champion, Anne; Neuman, Andrea E.; Richard Friedman; Mastro, Randy M.;
stevenrdonziger@gmail.com; 'zoe@littlepagebooth.com' (zoe@littlepagebooth.com)
(zoe@littlepagebooth.com)

Subject: RE: Chevron Corp. v. Donziger, 11-Civ-0691 (SDNY) (LAK)

Thank you.

[REDACTED]
Law Clerk to the Honorable Lewis A. Kaplan Southern District of New York
500 Pearl St.
New York, NY 10007

From: Julio Gomez <jgomez@gomezllc.com>
To: Richard Friedman <rfriedman@friedmanrubin.com>, [REDACTED] <[REDACTED]@nysd.uscourts.gov>, "Champion, Anne" <AChampion@gibsondunn.com>
Cc: "Neuman, Andrea E." <ANeuman@gibsondunn.com>, "Mastro, Randy M." <RMastro@gibsondunn.com>, "stevenrdonziger@gmail.com" <stevenrdonziger@gmail.com>, "'zoe@littlepagebooth.com'" (zoe@littlepagebooth.com) (zoe@littlepagebooth.com)" <zoe@littlepagebooth.com>
Date: 02/20/2014 04:52 PM
Subject: RE: Chevron Corp. v. Donziger, 11-Civ-0691 (SDNY) (LAK)

I shall be able to respond by tomorrow as well. Thank you.

Julio Gomez

From: Richard Friedman [rfriedman@friedmanrubin.com]
Sent: Thursday, February 20, 2014 4:46 PM
To: [REDACTED]@nysd.uscourts.gov; Champion, Anne
Cc: Neuman, Andrea E.; Julio Gomez; Mastro, Randy M.;
stevenrdonziger@gmail.com; 'zoe@littlepagebooth.com' (zoe@littlepagebooth.com)
(zoe@littlepagebooth.com)
Subject: RE: Chevron Corp. v. Donziger, 11-Civ-0691 (SDNY) (LAK)

I will be back to you by the end of the day tomorrow, if not sooner.
Rick

-----Original Message-----

From: [REDACTED]@nysd.uscourts.gov [REDACTED]
Sent: Thursday, February 20, 2014 9:08 AM
To: Champion, Anne
Cc: Neuman, Andrea E.; Chevron Service - Camacho/Piaguaje:Gomez, J.; Richard Friedman; Mastro, Randy M.; stevenrdonziger@gmail.com;
'zoe@littlepagebooth.com' (zoe@littlepagebooth.com)
(zoe@littlepagebooth.com)
Subject: Re: Chevron Corp. v. Donziger, 11-Civ-0691 (SDNY) (LAK)

Judge Kaplan would like all parties to confirm that the document titled "Plaintiff's Objections to Defendants' Trial Exhibits," dated Nov. 25, 2013, contains a complete list of defendants' exhibits received (subject to objection) at trial. If it does not, please provide such a list that is agreed to by all parties.

Thank you,

Law Clerk to the Honorable Lewis A. Kaplan Southern District of New York
500 Pearl St.
New York, NY 10007

From: "Champion, Anne" <AChampion@gibsondunn.com>
To: "[REDACTED]@nysd.uscourts.gov"
[REDACTED]@nysd.uscourts.gov>
Cc: "Mastro, Randy M." <RMastro@gibsondunn.com>, "Neuman, Andrea E." <ANeuman@gibsondunn.com>, "Chevron Service - Camacho/Piaguaje:Gomez, J." <jgomez@gomezllc.com>, "stevenrdonziger@gmail.com" <stevenrdonziger@gmail.com>, "'zoe@littlepagebooth.com' (zoe@littlepagebooth.com) (zoe@littlepagebooth.com)" <zoe@littlepagebooth.com>, "Richard Friedman (rfriedman@friedmanrubin.com) (rfriedman@friedmanrubin.com)" <rfriedman@friedmanrubin.com>
Date: 02/19/2014 05:53 PM
Subject: Chevron Corp. v. Donziger, 11-Civ-0691 (SDNY) (LAK)

Dear [REDACTED]:
Attached are the PDFs you requested of materials previously submitted to the Court. Please let me know if you need anything further.
Respectfully submitted,
Anne Champion

Anne Champion

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

[attachment "Plaintiff's Objections to Defendants' Exhibits (2013.11.25).pdf" deleted by [REDACTED]/NYSD/02/USCOURTS] [attachment "Final Plaintiff's Trial Exhibit List (12_19_2013) (sorted by PX Number).pdf" deleted by [REDACTED]/NYSD/02/USCOURTS]